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November 20, 2007

Marie Blanchard
c/o Senator Brian Joyce
State House, Room 413-A
Boston, MA 02133

Re: **Wind Power in the Blue Hills Reservation; RERL report on Siting Considerations**

Dear Ms. Blanchard:

Thank you for providing Mass Audubon with the report entitled, *Wind Power in the Blue Hills Reservation: Siting Considerations for a Wind Turbine*, November 2, 2007, by Sally Wright of the Renewable Energy Research Laboratory at UMass. As requested, our comments are provided herein. This report is a preliminary analysis based on limited amounts of existing information. We offer several suggestions for further information gathering and analyses.

Mass Audubon recognizes the serious threats to people and ecosystems due to greenhouse gas emissions and associated climate change. We support ***adoption of a two-pronged approach to climate change policy*** that includes:

- **Reducing** greenhouse gas emissions through **conservation**, increased **efficiencies**, and **renewable** energy sources; and
- **Facilitating the adaptation** of plants and animals to climate change impacts in terrestrial, marine and freshwater habitats.

The siting of renewable energy facilities needs to be undertaken in a manner that does not unduly impact the second goal. In particular, impacts on sensitive natural habitats on protected public lands need to be carefully considered along with alternative sites that achieve the renewable production goals while minimizing impacts.

Project Scope, Effects, and Article 97: The scope of the potential project is unclear at this time. The size and number of turbines involved have a significant bearing on the degree of impact to the Reservation's resources and its Article 97 status. The report states on p. 7, *It is not known if the sites carry Article 97 restrictions*. The Blue Hills Reservation in its entirety is parkland owned by the Commonwealth and therefore subject to Article 97 of the State Constitution. If a small-scale turbine is proposed, primarily designed and appropriately sized to provide ancillary electrical support to existing facilities within the Reservation and involving minimal changes in existing lands, it may be argued that such a facility would not constitute a "change in use" and therefore would not trigger Article 97 review.

If, however, the project would involve turbines at a scale where the majority of the power would be distributed into the electric grid, and/or if significant changes such as land clearing, road construction, or new or upgraded utility lines would be needed, then it is Mass Audubon's opinion that the project would trigger Article 97. If that is the case, according to established state policy replacement land equal in both monetary and resource value would have to be provided. Given the special natural and landscape attributes of Great Blue and Chickatawbut Hills, this would be a formidable hurdle to overcome.

Alternatives:

Additional alternatives for renewable energy generation within the Blue Hills Reservation may be available, such as:

- Five buildings on Chickatawbut Hill have flat roofs that could hold numerous solar panels that would have no impact on the Reservation. We suggest considering installation of solar panels that in addition to providing electricity and hot water for the facility could be included as a part of our educational program on green energy.
- Quarry Area of the Blue Hills Reservation: This area adjacent to the Southeast Expressway may have good wind characteristics while involving lesser impacts to the Reservation. The site being a former granite quarry has already been disturbed, is on the far edge of the Reservation giving it less visual impact than Chickatawbut or Great Blue Hill and has a better access road.

Met Tower: The Blue Hills Observatory hosts the oldest continuous weather records in the nation. The impacts of installing a Met tower for next stages of feasibility analysis should be weighed against the large amount of data already available and its potential applicability for that analysis.

Migratory Birds: As noted in the report, the site is designated by Mass Audubon as an Important Bird Area (IBA). Information regarding the criteria for and purpose of IBAs and a description of the Blue Hills IBA is available on Mass Audubon's website at: http://www.massaudubon.org/Birds_&_Beyond/IBAs/index.php. The Blue Hills Reservation provides habitat to an array of bird species, notably raptors and songbirds. The raptors that migrate through the Blue Hills use these hilltops as they create the updrafts and thermals, which are crucial for them to gain lift during migration. The Reservation also has large numbers of breeding pairs of several species that are of concern elsewhere in Massachusetts, including Wood Thrush, Eastern Towhee, Prairie Warbler, and American Woodcock. Mass Audubon staff have gathered information regarding migratory birds, including a bird banding operation, at Chickatawbut Hill since 1981. We can make our records available for review at the Trailside Museum upon request and appointment.

Rare Species: The Chickatawbut Hill site is located within Priority Habitat of state-listed rare species. Activities that may alter the habitat or potentially disrupt the nesting, breeding, feeding, or migratory activity of those species may be regulated under the Massachusetts Endangered Species Act. The Natural Heritage and Endangered Species Program can be consulted for further information, and their review process is explained in detail at: www.nhosp.org.

In conclusion, Mass Audubon appreciates the opportunity to review and comment on this report. If further planning is undertaken regarding renewable energy development at the Blue Hills Reservation, we recommend that a public participation process be an integral part of that effort.

Sincerely,



John J. Clarke
Director of Public Policy & Government Relations

cc: Ian A. Bowles, Secretary, EOEEA
Richard Sullivan, Commissioner, DCR
Henry Woolsey, NHESP
Friends of the Blue Hills